

US DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CONNOR BRADLEY,)	
Plaintiff,)	
)	CIVIL DIVISION
v.)	Docket No. _____
)	
ANDREW EHLE,)	
Defendant.)	

COMPLAINT AND JURY TRIAL DEMAND

Plaintiff, Connor Bradley, by and through his attorneys, Peter Ettenberg and Thomas Sherrer, alleges as follows:

PARTIES

1. Plaintiff Connor Bradley (herein after referred to as “Mr. Bradley”) is over 18 years old and is a resident of Charlotte, Mecklenburg County, State of North Carolina.
2. Upon information and belief, Defendant Andrew Ehler (herein after referred to as “Mr. Ehler”) is a resident of Hingham, Plymouth County, State of Massachusetts.

JURISDICTION AND VENUE

3. The amount in controversy exceeds \$75,000, exclusive of interest and costs.
4. This Court has diversity jurisdiction pursuant to 28 U.S.C. § 1332(a).
5. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2), since a substantial part of the events giving rise to Plaintiff’s claim occurred in the District of Massachusetts.

STATEMENT OF FACTS

6. On November 3, 2017, Mr. Bradley was a passenger in Mr. Ehler’s vehicle traveling south on Interstate-495 in or near Berlin, Massachusetts.

7. Mr. Bradley and Mr. Ehler were traveling from the University of Vermont to Holy Cross for a club ice hockey game.

8. As the vehicle came over a ridge line on the highway, Mr. Bradley observed there was stopped traffic in the lanes ahead.

9. Mr. Bradley looked over to see if the driver, Mr. Ehler, saw the stopped traffic and noticed that Mr. Ehler was texting on his cell phone.

10. Mr. Ehler was still traveling approximately 50 miles per hour.

11. Mr. Ehler was not able to stop in time and smashed into the rear end of the vehicle in front of his.

12. As a result of this violent collision, front and side airbags deployed, striking Mr. Bradley in the face and driving his head back into the headrest.

13. Mr. Bradley experienced dizziness and light-headedness after the collision.

14. The Berlin Fire and EMS responded to the scene and evaluated Mr. Bradley for his injuries.

15. The Berlin Fire and EMS transported Mr. Bradley from the collision scene to the University of Massachusetts Memorial-Marlboro Hospital.

16. The Defendant failed to use ordinary care by various acts and omissions, including, but not limited to, the following, each of which singularly or in combination with others, was a proximate cause of the occurrence in question:

- a. Failing to keep his vehicle under control;
- b. Failing to operate his vehicle with care; and
- c. Failing to keep a proper lookout.

17. As a direct and proximate result of the collision described herein, Plaintiff Connor

Bradley has suffered severe personal injuries, including, but not limited to, a traumatic brain injury, a whiplash injury, suffered an annular at C6-C7, neck and cervical spine pain, inability to sleep, constant pain and suffering, mental anguish and a loss of enjoyment of life and will, in reasonable probability, continue to do so in the future by reason of the nature and severity of his injuries; and he has incurred medical charges and expenses in the past and will, in reasonable probability, continue to incur medical expenses in the future for treatment of his injuries.

By reason of the above and foregoing, Plaintiff Connor Bradley has been damaged in a sum in excess of the minimum jurisdictional limits of this Court.

WHEREFORE, Plaintiff demands judgment against the Defendant for:

1. Compensatory damages;
2. Costs;
3. Reasonable attorney fees; and
4. Such further relief as the Court deems just.

JURY DEMAND

The Plaintiff, by and through his attorneys, Gould & Ettenberg, P.C. and Thomas Sherrer, PLLC, respectfully request a trial by jury on all issues.

DATED AT Burlington, Vermont, this 27th day of October, 2020.

GOULD & ETTENBERG, P.C.

/s/ Peter L. Ettenberg

Peter L. Ettenberg
GOULD & ETTENBERG, P.C.
370 Main Street Suite 1050
Worcester, MA 01608
Attorney for the Plaintiff

THOMAS SHERRER | PLLC

/s/ Thomas J. Sherrer

Thomas J. Sherrer, Esq.
THOMAS SHERRER | PLLC
Waterfront Plaza
180 Battery Street, Suite 360
Burlington, VT 05401
Attorney for the Plaintiff
(Motion to Appear Pro Hac Vice Pending)